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2005 FEB 14 P 4:4

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES' PROPOSED VOIR DIRE QUESTIONS

In addition to the Court's customary introduction to the jury, the United States requests that the Court ask prospective jurors the following voir dire questions:

1. Have you, a family member, or someone close to you ever been involved in a criminal case as either a victim, a witness, or a person charged with a crime?
2. Are you, a family member, or someone close to you involved in the criminal justice system as a prosecutor, a defense attorney, or an employee of either a prosecutor or a defense attorney?
3. Are you, a family member, or someone close to you employed by any law enforcement agency?
4. Are you, a family member, or someone close to you employed in any aspect of the real estate business, including sales or financing?
5. Are you, a family member, or someone close to you employed in any aspect of the business of banking or mortgage lending?
6. This case involves charges that the defendant defrauded and attempted to defraud various banks and lenders in connection with the financing of a residence located at 940

Nantasket Avenue, Hull, Massachusetts. Have you read or heard anything about this matter?

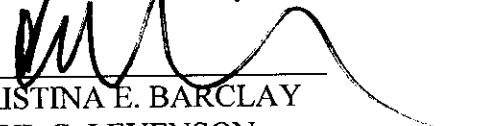
8. Are you familiar with any of the individuals on either the United States' or the defendant's witness lists?

9. Are you, a family member, or someone close to you employed by: America's Moneyline, Inc.; South Shore Savings Bank; Household Finance Corporation; Wells Fargo Bank, N.A.; Countrywide Home Loans, Inc.; Washington Mutual Bank, F.A.; Fairmont Funding LTD; Aurora Loan Servicing; or Lehman Brothers Bank, FSB?

9. Have you, a family member, or someone close to you had any dealings, favorable or unfavorable with any of the following companies, that might affect your consideration of this case? America's Moneyline, Inc.; South Shore Savings Bank; Household Finance Corporation; Wells Fargo Bank, N.A.; Countrywide Home Loans, Inc.; Washington Mutual Bank, F.A.; Fairmont Funding LTD; Aurora Loan Servicing; or Lehman Brothers Bank, FSB.

Respectfully submitted,

MICHAEL J. SULLIVAN
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By: 

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Dated: February 14, 2005

CERTIFICATE OF SERVICE

I hereby certify that on this day I will cause a true copy of the above document to be served by hand upon counsel of record for defendant, addressed as follows:

ROBERT L. SHEKETOFF, ESQ.
One McKinley Square
Boston, MA 02109

February 14, 2005


KRISTINA E. BARCLAY